

January 30, 2002

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the ACC's HPV Test Plan and Robust Summary for Acetic Acids and Salts

Dear Administrator Whitman:

The following comments on the American Chemistry Council's (ACC's) test plan for the acetic acids and salts category are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

The ACC has developed a defensible category of acetic acids and salts, which are similar in their structure, physical and chemical properties, and metabolism. These compounds are naturally occurring in many fruits and vegetables, and are critical for basic metabolic processes. They are labeled Generally Recognized as Safe by the Food and Drug Administration.

The ACC has presented comprehensive and clear robust summaries and has included analysis of trends in the properties and toxicity among the category members. The ACC has provided data for each SIDS endpoint under the HPV program and has appropriately concluded that no additional testing is necessary.

We commend the ACC's efforts in providing a transparent and thoughtful submission. Further testing on animals would not expand the public health understanding of this chemical or change the way it is handled.

Thank you for the opportunity to comment. I can be reached at 202-686-2210, ext. 302, or via e-mail at ncardello@pcrm.org.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist